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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH**

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ELIZABETH HERNANDEZ,

Plaintiffs,

v.

ROB KOLKMAN, CONSTABLE  
KOLKMANN LLC, and JOHN DOES 1-  
5,

Defendants.

**MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF'S  
MOTION FOR RULE 11 SANCTIONS**

Case No.: 2:23-cv-00772

Judge Ann Marie McIff Allen  
Magistrate Judge Daphne A. Oberg

Defendants, Rob Kolkman and Rob Kolkman LLC (collectively “Defendants”), by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 7-1(a)(5), hereby move the court for an extension of time for Defendants to file their Response to Plaintiff’s Motion for Rule 11 Sanctions (ECF 87). The current deadline for Defendants’ Response is September 2, 2025, which has not expired. Good cause exists due to the Memorial Day holiday travel as well as Defendants’ counsel managing some unexpected personal family concerns. Therefore, Defendants request that it be granted a brief and reasonable extension through September 10, 2025 is

reasonable, and respectfully ask that the Court grant the accompanying proposed Order to that effect, which is attached hereto as Exhibit A (and emailed concurrently to the Court.)

DATED the 2<sup>nd</sup> day of September 2025.

**GORDON REES SCULLY  
MANSUKHANI, LLP**

/s/ J. Tyler Martin

J. Tyler Martin

*Attorneys for Rob Kolkman and Constable  
Kolkman LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 2, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing

/s/ J. Tyler Martin